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State of Utah DEPARTMENT OF NATURAL RESOURCES DIVISION OF OIL, GAS AND MINING

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September 26, 2000

TO:

THRU:

Susan M. White, Team Lead, MINO

FROM:

David W. Darby, Reclamation Specialist III

RE:

Revised Permit Area, Mountain Coal Company, Gordon Creek #2, #7, & #8

Mine, A M99C-2

SUMMARY:

DOGM received a response to deficiencies for the Revised Permit Area amendment on July 25, 2000. The original proposal was received on February 2, 2000. Deficiencies were identified in a Technical Analysis sent to the applicant on May 9, 2000.

Hydrologic information was requested under the Operational section.

R645-301-750, an analysis must be provided assessing hydrology data relative to the impact projections contained within the PHC and CHIA. The analysis must show that onsite impacts have been minimized and that offsite impacts have been prevented.

HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

Analysis:

The application has outlined measures, previously taken and in use to suggest that the disturbed/reclaimed area and surrounding area (above the mine) meet the post-mining land use. The post-mining land use for the disturbed/reclaimed area is wildlife habitat, and the surrounding area (above the mine) is primarily grazing. However, it includes wildlife habitat, hunting, sightseeing, watershed, hiking and recently logging.

TECHNICAL MEMO

The hydrology of the area has been examined and monitored over the life of the project. The applicant submitted a hydrologic impact analysis containing monitoring information in Appendix 7-8. All of the monitoring sites were evaluated with respect to monitoring results. The operator suggests that no adverse effects to the hydrologic regime have taken place as a result of mining.

The applicant concludes that no off site impacts to the hydrologic regime have occurred from either subsidence or disturbance over the past 61/2 years of monitoring. All disturbed area runoff is directed to the sedimentation pond (a three celled pond), which has only discharged one time, and that was a result of piping on the lower cell, when a marmot dug into the embankment. Water quality samples were taken of the discharge and revealed no excessive levels of water quality. The pond has captured and contained the runoff of large storms without discharging.

The applicant discussed the impacts of subsidence on surface and groundwater flow and quality. There are no indications that any streams, springs or water bodies have been impacted as a result of mining.

Findings:

Performance Standards

R645-301-73. (1) Prior to the release of the mined area from the permit, the applicant needs to show the analytical conclusions that identify the no impact theory, rather than presenting statements. Any irregularities in the data pattern should be described and discussed. The applicant should identify if the water monitoring program and finding were consistent with the Probable Hydrologic Consequences (PHC). (2) The applicant has not summarized the total record of water quality and quantity that compares pre-mining conditions to post-mining conditions. The Utah Coal Mining Water Quality database shows water monitoring data collected since 1979. The information should be used to identify water quantity and quality trends over the mining period.

RECOMMENDATIONS:

It is recommended that this submittal not be approved until the above referenced information is adequately addressed.